IN THE UNITED STATES DISTRICT COURT WESTERN DISTRICT OF TEXAS AUSTIN DIVISION

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Leila Green Little, et al.,	§	
	§	
Plaintiffs,	§	
	§	
V.	§	Civil Action No. 1:22-cv-00424-RP
	§	
Llano County, et al.,	§	
	§	
Defendants.	§	
	§	

PLAINTIFFS' DESIGNATION OF TESTIFYING EXPERTS

Plaintiffs serve this designation of Retained Testifying Experts pursuant to Fed. R. Civ. P. 26(a)(2)(B) and the parties' Agreed Scheduling Order (ECF No. 56).

I. TESTIFYING EXPERTS

Plaintiffs designate the following retained expert witnesses to provide testimony in this case:

A. Belinda Boon, MLIS, PhD

Areas of Expertise: Library Sciences.

Dr. Boon is a professor at Kent State University School of Information, an American Library Association-accredited program located in Kent, Ohio where she has taught graduate-level courses in public librarianship since 2006. She has worked as a librarian director in libraries in Texas, and she has worked as a consultant for the State of Texas in the field of librarianship. In that capacity, Dr. Boon developed and managed a management training program for small community library directors who do not have professional library degrees, and created a nationally recognized weeding manual called *The CREW Method: Expanded Guidelines for Collection Evaluation and Weeding for Small and Medium-sized Public Libraries.* For a more detailed summary of Dr. Boon's skills, training, education, experience, and knowledge, please

see her *curriculum vitae*, which has been separately served on Defendants as **Exhibit 1** to her report and is incorporated by reference. Her CV also contains a list of her publications.

Dr. Boon will testify that the removal of the books at issue in this case was not done in accordance with standard weeding practices or the *CREW Manual*. For a more detailed discussion of her opinions and basis for those opinions, please see her report which was served separately on Defendants.

B. R. David Lankes, MS, PhD

Areas of Expertise: Library Sciences.

Dr. Lankes is the Virginia & Charles Bowden Professor of Librarianship at the University of Texas at Austin's School of Information who began his scholarly career in 1992. He has served as the director of the School of Information Science and Associate Dean for the College of Information and Communications at the University of South Carolina as well as the Follett Chair of Library and Information Science at Dominican University. Dr. Lankes has taught graduate students in library science for over 25 years at top ranked library science programs in the United States.

For a more detailed summary of Dr. Lankes's skills, training, education, experience, and knowledge, please see his *curriculum vitae*, which has been separately served on Defendants as **Exhibit 1** to his report. His CV also contains a list of his publications.

Dr. Lankes will testify that (1) the Defendants failed to follow their own stated policies in both collection development and weeding; (2) the Llano County Library does not have an appropriately well-defined materials challenge process and the ad hoc procedure used by the defendants violates both the Llano County Library's policies and the norms of library practice; (3) the Defendants' use (in whole or part) of lists of books created by third parties in making deselection decisions was improper; (4) the Defendants' removal of certain materials from the shelves and the catalog and subsequent placement in an in-house system that was not publicly available violates the applicable standards and best practices and unnecessarily burdens Llano County Library patrons; and (5) the evidence strongly suggests that the re-constituted Llano

Library Advisory Board displayed an overreach of authority and acted against the norms of librarianship and best practices as outlined in the Texas Public Library Standards.

For a more detailed discussion of his opinions and basis for those opinions, please see his report which was served separately on Defendants.

Dated: February 17, 2023 Respectfully submitted,

/s/ Ellen Leonida

Ellen V. Leonida (CA Bar No. 184194) Matthew Borden (CA Bar No. 214323 J. Noah Hagey (CA Bar No. 262331) Max Bernstein (NY Bar No. 5609037)

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Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on February 17, 2023, a true and correct copy of the foregoing document was served on all counsel of record who have appeared in this case using the Court's CM/ECF system as a Filing User.

/s/ Ellen Leonida	
Ellen V. Leonida	